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- and -

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Heather Lennox  
Ryan T. Routh  
Daniel M. Syphard

Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11
	:	
Oldco M Corporation	:	Case No. 09-13412 (MG)
(f/k/a Metaldyne Corporation), <i>et al.</i> ,	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
-----X	:	

**NOTICE OF HEARING ON OMNIBUS OBJECTION  
OF DEBTORS AND DEBTORS IN POSSESSION SEEKING TO  
DISALLOW CERTAIN LATE-FILED CLAIMS (OMNIBUS OBJECTION NO. 2)**

**TO THE CLAIMANTS IDENTIFIED ON THE ATTACHED EXHIBIT AND SUBJECT TO THE ATTACHED OBJECTION:**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. Oldco M Corporation (f/k/a Metaldyne Corporation) and 30 of its domestic direct and indirect subsidiaries, as debtors and debtors in possession (collectively, the "Debtors"), filed an objection (the "Objection") to the proof(s) of claim you filed against one or more of the Debtors' estates. That Objection is appended to this Notice and is entitled "Omnibus Objection of Debtors and Debtors in Possession Seeking to Disallow Certain Late-Filed Claims (Omnibus Objection No. 2)."
2. Your proof(s) of claim may be disallowed and/or otherwise affected as a result of the Objection. Therefore, you should read this Notice and the attached Objection carefully. Moreover, you should locate your name and claim on Exhibit 1 attached to the Objection.
3. As set forth in the Objection, the Debtors have determined that one or more of your proofs of claim was filed after the applicable bar dates established by the Court in these cases.
4. **On February 9, 2010 at 10:00 a.m., prevailing Eastern Time**, a hearing (the "Hearing") on the Objection will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, in Courtroom 501 at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408.
5. If you disagree with the Objection, you or your attorney **must**: (a) file a written response (a "Response") to the Objection with the Clerk of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408 **no later than January 18, 2010 at 4:00 p.m., prevailing Eastern Time**; and (b) serve copies of your response so as to be **actually received** no later than **January 18, 2010 at 4:00 p.m., prevailing Eastern Time**, by the following parties: (i) the Debtors, c/o Oldco M Corporation, 47603 Halyard Drive, Plymouth, Michigan 48170 (Attn: Larry Carroll); (ii) Jones Day, 222 East 41st Street, New York, New York 10017 (Attn: Richard Engman, Esq.); (iii) Jones Day, North Point, 901 Lakeside Avenue, Cleveland, Ohio 44114-1190 (Attn: Heather Lennox, Esq.); and (iv) the parties on the Special Service List in these cases, established under the Administrative Order, Pursuant to Bankruptcy Rule 1015(c), Establishing Case Management and Scheduling Procedures in these cases (Docket No. 133) (as it may be amended, the "Case Management Order").
6. Any Response should contain the following:
  - ♦ The approved case caption (including the hearing date in the upper right-hand corner) and the title of the Objection to which the Response is directed;

- ◆ The name of the claimant and description of the bases for the amount of the underlying claim;
  - ◆ A concise statement setting forth the reasons why the Court should not sustain the Objection, including, but not limited to, the specific factual and legal bases upon which the Claimant will rely in opposing the Objection;
  - ◆ A copy of any documentation or other evidence of the claim upon which the claimant will rely in opposing the Objection at the Hearing, to the extent that such documentation or evidence is not included with the claimant's proof of claim;
  - ◆ A declaration of a person with personal knowledge of the relevant facts that support the Response unless the claimant intends to rely solely on the documents submitted with the claimant's proof of claim and Response; and
  - ◆ The name(s), address(es), telephone number(s), facsimile number(s) and e-mail address(es) of the person(s) (who may be the claimant and/or the claimant's legal representative) to whom the Debtors' attorneys should serve any reply to the Response.
7. To facilitate a resolution of the Objection, you are encouraged to provide in your Response the name(s), address(es), telephone number(s), facsimile number(s) and e-mail address(es) of the person(s) who possess the authority to reconcile, settle or otherwise resolve the Objection on your behalf.
  8. If you or your designated attorney or representative do not timely file and serve the Response in accordance with the above-referenced procedures, the Court may enter an order granting the relief requested in the Objection. If you or your designated representative or attorney do file a Response and the matter is not otherwise resolved, it will be presented to the Court at the Hearing. Only those Responses made in accordance with the above-referenced requirements and timely filed and received by the Court and the Debtors' attorneys will be considered by the Court at the Hearing. **If you fail to respond in accordance with this Notice, the Court may grant the relief requested in the Objection without further notice or hearing.**
  9. Additional copies of the Objection and copies of the Case Management Order and the Special Service List may be obtained from the Court's website at <http://ecf.nysb.uscourts.gov> or, free of charge, at [www.bmcgroup.com/metaldyne](http://www.bmcgroup.com/metaldyne).

Dated: December 18, 2009  
New York, New York

Respectfully submitted,

/s/ Ryan Routh

Richard H. Engman  
JONES DAY  
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ATTORNEYS FOR DEBTORS AND  
DEBTORS IN POSSESSION

Hearing Date and Time: February 9, 2010 at 10:00 a.m. (E.S.T.)  
Response Deadline: January 18, 2010 at 4:00 p.m. (E.S.T.)

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In re	:	Chapter 11
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Oldco M Corporation	:	Case No. 09-13412 (MG)
(f/k/a Metaldyne Corporation), <i>et al.</i> ,	:	
	:	(Jointly Administered)
Debtors.	:	
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**OMNIBUS OBJECTION OF DEBTORS AND  
DEBTORS IN POSSESSION SEEKING TO DISALLOW  
CERTAIN LATE-FILED CLAIMS (OMNIBUS OBJECTION NO. 2)**

**CLAIMANTS RECEIVING THIS OBJECTION SHOULD  
LOCATE THEIR NAME AND CLAIM(S) ON THE ATTACHED EXHIBIT 1.**

TO THE HONORABLE MARTIN GLENN  
UNITED STATES BANKRUPTCY JUDGE:

Oldco M Corporation (f/k/a Metaldyne Corporation) and 30 of its domestic direct and indirect subsidiaries, as debtors and debtors in possession (collectively, the "Debtors"), respectfully represent as follows:

**Background**

1. On May 27, 2009 (the "Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). By an order entered on May 29, 2009, the Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered. The Debtors are authorized to continue to operate their businesses and manage their properties as debtors in possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On June 4, 2009, the United States Trustee appointed, pursuant to section 1102 of the Bankruptcy Code, an official committee of unsecured creditors (Docket No. 129) (the "Creditors' Committee").

3. Oldco M Corporation (f/k/a/ Metaldyne Corporation) is a wholly-owned subsidiary of Metaldyne Holdings LLC ("Metaldyne Holdings"), which, in turn, is a wholly-owned subsidiary of Asahi Tec Corporation ("Asahi Tec"), a Japanese corporation. RHJ International S.A. ("RHJI"), a corporation formed under the laws of Belgium and listed on the Euronext exchange, presently holds approximately 60.1% of the outstanding capital stock of Asahi Tec. Debtor MD Products Corp. ("MD Products") is a New York corporation. Oldco M Corporation is the direct or indirect parent of MD Products, each of the other Debtors and each of the Debtors' nondebtor subsidiaries (collectively, the "Oldco M Companies"). As of the Petition Date, the Oldco M Companies were leading global manufacturers of highly engineered

metal components for the global light vehicle market and among the 50 largest auto parts suppliers in North America.

4. Shortly after the Petition Date, the Debtors filed motions (Docket Nos. 214 and 323) to sell a majority of their assets and to establish an auction process or processes and bid procedures to consummate these sales, and also began the process of marketing their other business units for sale (collectively, the "Sale Processes"). On August 5, 2009 and August 6, 2009, the Debtors held an auction (the "Auction"), pursuant to which MD Investors Corporation ("MD Investors") presented a bid for the assets, which included a cash component, a credit bid component and other consideration. On August 12, 2009, the Court entered an order (Docket No. 674) (the "Sale Order") authorizing the sale to MD Investors (the "MD Investors Transaction") of substantially all of the Debtors' assets free and clear of all liens, claims, interests and encumbrances. The MD Investors Transaction closed on October 16, 2009. The Debtors are in the process of winding down and liquidating their remaining assets and seeking confirmation of a plan of liquidation in these cases.

5. For the fiscal year ended March 29, 2009, the Oldco M Companies recorded annual revenue of approximately \$1.32 billion, of which approximately \$782 million was from sales of the Debtors. As of March 29, 2009, utilizing book values, the Oldco M Companies had assets of approximately \$977 million and liabilities of approximately \$927 million.

#### **Background Regarding the Claims Process**

6. On July 7, 2009, the Debtors filed their respective schedules of assets and liabilities and statements of financial affairs (Docket Nos. 361-391) (collectively, the "Schedules"). By an order entered on July 7, 2009 (Docket No. 394) (the "Bar Date Order"),

the Court established August 14, 2009 as the general bar date applicable for most creditor for the filing of proofs of claim asserting prepetition liabilities against the Debtors (the "General Bar Date"). The Bar Date Order, among other things, also established bar dates for: (a) the filing of proofs of claim in response to any amendments to the Schedules; (b) claims for damages arising from the rejection of executory contracts and unexpired leases; and (c) a bar date for governmental units (collectively with the General Bar Date, the "Bar Dates").

7. After the entry of the Bar Date Order, the Debtors provided notice of the Bar Dates to all known creditors and potential creditors in accordance with the requirements of the Bar Date Order. Over 3,500 proofs of claim have been filed in these cases to date. Approximately 1,000 additional claims are deemed filed pursuant to section 1111(a) of the Bankruptcy Code due to their identification in the Schedules.

### **Jurisdiction**

8. This Court has subject matter jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **Requested Relief**

9. Pursuant to sections 105 and 502 of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Debtors hereby seek the entry of an order disallowing and expunging each proof of claim identified as a "Claim To Be Expunged" in the attached Exhibit 1<sup>1</sup> (collectively, the "Late-Filed Claims"), because each of the Late-Filed Claims was filed after the Bar Date applicable to that Claimant's claims established by

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<sup>1</sup>

Nothing in the Exhibit should be construed as an admission of the validity or priority of any claim included thereon.



the Bar Date Order. The Debtors have identified the "File Date" for each Late-Filed Claim on Exhibit 1. The Debtors also have identified on Exhibit 1 the Bar Date that applies to each Late-Filed Claim. In support of this Objection, the Debtors submit the Declaration of Daphne Corry Hoppenrath, which is incorporated herein and attached hereto as Exhibit 2.

**Request to Disallow the Late-Filed Claims**

10. This Court's entry of the Bar Date Order: (a) established, pursuant to Bankruptcy Rule 3003(c)(3), the Bar Dates; and (b) approved the form and manner of service of a notice of (i) the Bar Dates and (ii) the procedures for filing proofs of claim (the "Bar Date Notice"). On or about July 10, 2009, The BMC Group, Inc. ("BMC"), the Debtors' claims and noticing agent, served copies of the Bar Date Notice on the Debtors' creditors and other entities in accordance with the terms of the Bar Date Order.<sup>2</sup>

11. The Bar Date Order provides as follows:

Pursuant to Bankruptcy Rule 3003(c)(2), any entity that is required to file a proof of claim in these chapter 11 cases pursuant to the Bankruptcy Code, the Bankruptcy Rules or this Order with respect to a particular claim against a Debtor, but that fails to properly do so by the applicable Bar Date, shall be forever barred, estopped and enjoined from: (a) asserting any claim against the Debtors the entity has that (i) is in an amount that exceeds the amount, if any, that is identified in the Schedules on behalf of such entity as undisputed, noncontingent and liquidated or (ii) is of a different nature or a different classification than any claim identified in the Schedules on behalf of such entity (any such claim under subparagraph (a) of this paragraph being referred to herein as an "Unscheduled Claim"); or (b) voting upon, or receiving distributions under any plan of reorganization in these chapter 11 cases or otherwise from the Debtors' estates in respect of an

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<sup>2</sup>

On or about September 10, 2009, BMC served the Bar Date Notice on certain additional potential creditors who are potential plaintiffs to an alleged securities class action filed in the District Court for the Eastern District of Michigan. This Objection does not seek to disallow claims filed by these potential plaintiffs; however, the Debtors reserve the right to object to any claims asserted by these additional parties.

Unscheduled Claim, unless these cases are converted to chapter 7 cases and another bar date is established.

(Bar Date Order ¶ 15.)

12. The Debtors believe that all of the Late-Filed Claims: (a) arose prior to the Petition Date; (b) were subject to the requirement that they be filed by the Bar Date applicable to that Claimant (as defined below), as identified on Exhibit 1; and (c) nonetheless were filed after that applicable Bar Dates. Moreover, the Debtors have determined that each of the claimants identified on the attached Exhibit 1 (collectively, the "Claimants") was timely served with a copy of the Bar Date Notice on or about July 10, 2009 and therefore had adequate notice of the Bar Dates.

13. Section 502 of the Bankruptcy Code provides for the disallowance of the Late-Filed Claims. Section 502(b) of the Bankruptcy Code states, in relevant part, that "if [an] objection to a claim is made, the court, after notice and a hearing, shall . . . allow such claim . . . except to the extent that . . . proof of such claim is not timely filed." None of the Claimants have sought to excuse their Late-Filed Claims through the filing of a motion to enlarge time for filing proofs of claim. Because each of the Late-Filed Claims was filed in an untimely manner, and because such untimeliness has not been excused, the Claimants are not entitled to any distribution in respect of the Late-Filed Claims and the Late-Filed Claims should be disallowed and expunged on that basis alone in accordance with the applicable provisions of the Bar Date Order and the Bankruptcy Code.

#### **Reservation of Rights**

14. The Debtors reserve the right to further object, on any and all additional factual or legal grounds, to each of the Late-Filed Claims, if such Late-Filed Claims are not disallowed as late as requested herein. Without limiting the generality of the foregoing, the

Debtors specifically reserve the right to amend this Objection, file additional papers in support of this Objection or take other appropriate actions, including to: (a) respond to any allegation or defense that may be raised in a Response — filed in accordance with the Bankruptcy Code, the Bankruptcy Rules and orders of this Court — by or on behalf of any of the Claimants or other interested parties; (b) object further to any Late-Filed Claim for which a Claimant provides (or attempts to provide) additional documentation or substantiation; and (c) object further to any Late-Filed Claim based on additional information that may be discovered upon further review by the Debtors or through discovery pursuant to the applicable provisions of Part VII of the Bankruptcy Rules. In addition, as described above, the Debtors reserve and retain their rights to object to a Late-Filed Claim on any and all available grounds to the extent it is found the Late-Filed Claims was timely filed.

#### **Notice**

15. Pursuant to the Administrative Order, Pursuant to Rule 1015(c) of the Federal Rules of Bankruptcy Procedure, Establishing Case Management and Scheduling Procedures (Docket No. 133) (the "Case Management Order"), entered on June 5, 2009, notice of this Motion has been given to the parties identified on the Special Service List, the General Service List (as such terms are defined in the Case Management Order) and the Claimants on the attached Exhibit 1. The Debtors submit that no other or further notice need be provided under the circumstances.

#### **No Prior Request**

16. No prior request for the relief sought in this Motion has been made to this or any other court in connection with these chapter 11 cases.

WHEREFORE, the Debtors respectfully request that the Court (a) enter an order, substantially in the form attached hereto as Exhibit 3, disallowing and expunging the Late-Filed Claims; and (b) grant such other and further relief to the Debtors as the Court may deem proper.

Dated: December 18, 2009  
New York, New York

Respectfully submitted,

/s/ Ryan Routh

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ATTORNEYS FOR DEBTORS AND  
DEBTORS IN POSSESSION

## **EXHIBIT 1**

**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
1	ADT SECURITY SERVICES 14200 E EXPOSITION AVE AURORA, CO 80012	09-13412	3594	\$2,772.61	(U)	10/5/2009	8/14/2009
2	ALPHA TOOL & MOLD INC. 83 ALPHA PARK HIGHLAND HTS, OH 44143-2202	09-13418	3325	\$8,720.00	(A)	8/17/2009	8/14/2009
3	ALPHA TOOL & MOLD INC. 83 ALPHA PARK HIGHLAND HTS, OH 44143-2202	09-13415	3373	\$7,000.00	(A)	8/18/2009	8/14/2009
4	APCO FREIGHT SYSTEMS 303-B SWING ROAD GREENSBORO, NC 27419	09-13412	3491	\$9,165.00	(U)	9/21/2009	8/14/2009
5	ARC TECHNOLOGIES INC. PO BOX 219 GREENSBURG, PA 15601-0219	09-13426	3290	\$13,098.65	(U)	8/17/2009	8/14/2009
6	ARROW PEST CONTROL PO BOX 515 1815 N MICHIGAN ST PLYMOUTH, IN 46563-0515	09-13419	3317	\$211.56	(U)	8/17/2009	8/14/2009
7	ASARE, SAMUEL K 675 SEWARD ST APT 302 DETROIT, MI 48202-2443	09-13412	3319	BLANK	(U)	8/17/2009	8/14/2009
8	AT&T DBA BELLSOUTH ADVERTISING & PUBLISHING 600 N POINT PKWY ALPHARETTA, GA 30005	09-13412	3384	\$70.00	(U)	8/20/2009	8/14/2009
9	ATHWAL, SATNAM 29255 UTLEY FARMINGTON HILLS, MI 48334-4177	09-13412	3438	BLANK	(U)	8/28/2009	8/14/2009

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

**\*\* (A) - Administrative**  
**(P) - Priority**

**(S) - Secured**  
**(U) - Unsecured**

The classification of the claims set forth herein is the classification asserted on the filed proof of claim. The Debtors include such classification for the purpose of identifying the claim to which the objection applies. The inclusion of the classification shall not constitute an acknowledgement by the Debtors that such classification is correct or appropriate.

**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
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**CLAIMS TO BE EXPUNGED**

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10 ATS AUTOMATION TOOLING SYSTEMS 250 ROYAL OAK ROAD BOX 32100, PRESTON CENTER CAMBRIDGE, ON N3H 5M2 CANADA	09-13419	3496	\$892.50	(U)	9/24/2009	8/14/2009
11 ATWELL, DEBRA 2050 OAKWOOD DR TROY, MI 48085	09-13412	3498	\$235,000.00 \$58,000.00 \$58,000.00	(S) (P) (U)	9/25/2009	8/14/2009
12 BADERTSCHER, RICHARD W 840 ROAD 313 BLUFFTON, OH 45817-5817	09-13412	3287	BLANK	(U)	8/17/2009	8/14/2009
13 BAKER, NORMAN 8 PECAN ST BELLEVILLE, MI 48111-8500	09-13412	3320	BLANK	(P)	8/17/2009	8/14/2009
14 BDI-BEARING DISTRIBUTORS INC ATTN: ANDREA MOELLER PO BOX 936 WATERLOO, IA 50704	09-13412	3507	\$2,925.07 \$41,201.42	(A) (U)	10/2/2009	8/14/2009
15 BELL, THEODORE 1214 SAINT CLAIR ST DETROIT, MI 48214-3670	09-13412	3331	UNASCERTAINABLE \$849.00  UNLIQUIDATED	(P) (U)	8/17/2009	8/14/2009
16 BENEFIEL, ROBERT E PO BOX 398 MACKINAW CITY, MI 49701-0398	09-13412	3330	\$187,800.00	(P)	8/17/2009	8/14/2009
17 BENSON, RAYMOND D 378 E MOUNTAIN RD LONGVIEW, TX 75604-6813	09-13412	3322	BLANK	(U)	8/17/2009	8/14/2009

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
18	BIJUR LUBRICATING CORP BIJUR DELIMON INTERNATIONAL 2100 GATEWAY CENTRE STE 109 MORRISVILLE, NC 27560	09-13412	3556	\$2,564.90	(U)	11/17/2009	8/14/2009
19	BLEVINS, PATRICIA K 2359 BISHOPTOWN RD DUFFIELD, VA 24244	09-13412	3469	BLANK	(U)	9/8/2009	8/14/2009
20	BROUSSARD, GERALD 2114 WILDERNESS POINT DR KINGWOOD, TX 77339-2205	09-13412	3376	\$255.79  UNLIQUIDATED	(U)	8/20/2009	8/14/2009
21	BROWN, PATSY JUNE 33064 GROTH DR STERLING HEIGHTS, MI 48312-6704	09-13412	3522	BLANK	(U)	10/19/2009	8/14/2009
22	BUCHOLTZ, DENNIS L 758 HIGHLAND DR ST CLAIR, MI 48079-4234	09-13412	3354	BLANK	(P)	8/17/2009	8/14/2009
23	BURDICK, THOMAS E & SUSAN M TEN COM CRANBERRY RD 251 CRANBERRY RD GROVE CITY, PA 16127-4633	09-13412	3467	BLANK	(P)	9/3/2009	8/14/2009
24	BURRIS, BEN F 5699 SUNSET DR DUBUQUE, IA 52002-2466	09-13412	3303	\$225.60	(U)	8/17/2009	8/14/2009
25	BYRNE, RANDAL 10005 BROOKFIELD ST LIVONIA, MI 48150-5717	09-13412	3473	BLANK	(U)	9/8/2009	8/14/2009
26	CARBIDE PROBES INC 1328 RESEARCH PK DR DAYTON, OH 45432	09-13412	3580	\$1,665.00	(U)	9/21/2009	8/14/2009

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
27	CARBIDE PROBES INC 1328 RESEARCH PARK DR DAYTON, OH 45432	09-13412	3592	\$4,389.15	(U)	9/21/2009	8/14/2009
28	CARBIDE PROBES, INC. 1328 RESEARCH PARK DR DAYTON, OH 45432-2818	09-13416	3494	\$1,665.00	(U)	9/22/2009	8/14/2009
29	CARBIDE PROBES, INC. 1328 RESEARCH PARK DR DAYTON, OH 45432-2818	09-13421	3495	\$4,389.15	(U)	9/22/2009	8/14/2009
30	CARTER, MYRTLE B 11225 CLINCH RIVER HWY FT BLACKMORE, VA 24250-2550	09-13412	3297	BLANK	(U)	8/17/2009	8/14/2009
31	CENTURY SPRING CORP 222 E 16TH ST LOS ANGELES, CA 90015-3616	09-13417	3528	\$120.91	(U)	10/26/2009	8/14/2009
32	CHERRY, JENNIFER K 863 LION ST ROCHESTER HILLS, MI 48307-4224	09-13412	3472	BLANK	(U)	9/8/2009	8/14/2009
33	CICHANSKI, R 130 E WILMETTE AVE PALATINE, IL 60067-7247	09-13412	3437	\$27,431.78	(U)	8/28/2009	8/14/2009
34	CROSSLEY, MITCHELL 9145 MILFORD HOLLY, MI 48442	09-13412	3368	BLANK	(U)	8/18/2009	8/14/2009
35	CROSSLEY, MITCHELL N 9145 MILFORD RD HOLLY, MI 48442-8508	09-13412	3369	BLANK	(U)	8/18/2009	8/14/2009
36	CYRUS, JAMES R 5260 FREDONIA AVE DAYTON, OH 45431-2122	09-13412	3328	BLANK	(U)	8/17/2009	8/14/2009

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
37	DALTON COMBUSTION SYSTEMS INC. PO BOX 25714 VALLEY VIEW, OH 44125-0714	09-13412	3436	\$696.00	(U)	8/28/2009	8/14/2009
38	DE ANGELIS, TERESA VIA RIMEMBRANZE 18 0510 SOTTO BG SOTTO 24046, ITALY	09-13412	3457	BLANK	(P)	9/1/2009	8/14/2009
39	DESIGN COMFORT CO. INC. 5977 BRIGHTON PINES CT HOWELL, MI 48843-6453	09-13417	3574	\$4,879.50	(U)	11/30/2009	8/14/2009
40	EDRICH PRODUCTS 33672 DOREKA FRASER, MI 48026	09-13412	3355	\$4,588.33	(U)	8/17/2009	8/14/2009
41	ELLERBROCK, ROBERT L 117 CARLINGS AVE OTTAWA, OH 45875-9404	09-13412	3311	BLANK	(U)	8/17/2009	8/14/2009
42	EQUIPMENT DEPOT OF ILLINOIS 2545 NORTHWEST PKWY ELGIN, IL 60124-7870	09-13412	3552	\$59,230.78	(U)	11/9/2009	8/14/2009
43	EVERETT, CHARLIE 336 KNOLLWOOD CIR SUMMERVILLE, GA 30747-5147	09-13412	3314	BLANK	(U)	8/17/2009	8/14/2009
44	FEDERAL-MOGUL CORPORATION CHAVANDA CENANCE 26555 NORTHWESTERN HWY SOUTHFIELD, MI 48033-2146	09-13412	3493	\$8,435.00 \$236,351.98 \$295,340.15	(S) (A) (U)	9/21/2009	8/14/2009
45	FIRE DEFENSE EQUIPMENT CO INC 4350 DELEMERE BLVD ROYAL OAK, MI 48073-1807	09-13412	3479	\$6,749.92	(U)	9/8/2009	8/14/2009

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

**\*\* (A) - Administrative**  
**(P) - Priority**

**(S) - Secured**  
**(U) - Unsecured**

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**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
46	FORD MOTOR CREDIT COMPANY LLC PO BOX 537901 LIVONIA, MI 48153-9905	09-13412	3425	\$5,221.20	(S)	8/19/2009	8/14/2009
47	GENERAL KINEMATICS 5050 RICKERT RD CRYSTAL LAKE, IL 60014-7333	09-13412	3521	\$2,954.83	(U)	10/16/2009	8/14/2009
48	GIBSON, CURTIS 4689 CR 26 RAWSON, OH 45881-5881	09-13412	3527	BLANK	(U)	10/26/2009	8/14/2009
49	GROOT INDUSTRIES 2500 LANDMEIR ROAD ELK GROVE VILLAGE, IL 60007	09-13418	3497	BLANK	(U)	9/25/2009	8/14/2009
50	GUFFEY, TONY 511 S 12TH ST NEW CASTLE, IN 47362	09-13412	3480	BLANK	(U)	9/11/2009	8/14/2009
51	H D H MECHANICAL INC. 5040 CORBIN DR BEDFORD HEIGHTS, OH 44128-5414	09-13415	3433	\$9,250.21	(U)	8/27/2009	8/14/2009
52	HADYNAK, SCOTT A 12055 CRAIG ST ROMULUS, MI 48174-1106	09-13412	3510	BLANK	(P)	10/7/2009	8/14/2009
53	HAGEMEYER NORTH AMERICA PO BOX 404753 ATLANTA, GA 30384-4753	09-13412	3520	\$2,906.21	(U)	10/16/2009	8/14/2009
54	HAMILTON, JAMES 3300 HILL RD OSSEO, MI 49266	09-13412	3523	BLANK	(P)	10/19/2009	8/14/2009
55	HARRIS, PAUL 1388 SPEIGHT RD GREENVILLE, NC 27834	09-13412	3336	BLANK	(U)	8/17/2009	8/14/2009

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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**(P) - Priority**

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**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
56 HASKIN & LARUE LLP JOHN HASKIN & JAY MEISENHOLDER 255 N ALABAMA ST INDIANAPOLIS, IN 46204-2131	09-13422	3340	\$100,000.00	(U) CONTINGENT UNLIQUIDATED DISPUTED	8/17/2009	8/14/2009
57 HASKIN & LARUE LLP JOHN H HASKIN ESQ ATTORNEY FOR PLAINTIFF GEE 255 N ALABAMA ST INDIANAPOLIS, IN 46204	09-13412	3341	\$100,000.00	(U) CONTINGENT UNLIQUIDATED DISPUTED	8/17/2009	8/14/2009
58 HEFTY, PHILIP R 2640 COUNTY RD 36A AUBURN, IN 46706-9401	09-13412	3329	\$202.75	(P) UNLIQUIDATED	8/17/2009	8/14/2009
59 HENDRIAN, MICHAEL D 18551 VALLEYBROOK LN CLINTON TOWNSHIP, MI 48038	09-13412	3377	BLANK	(U)	8/20/2009	8/14/2009
60 HERRERA, FERMIN 3145 N OAKLEY AVE CHICAGO, IL 60618-6985	09-13412	3302	BLANK	(U)	8/17/2009	8/14/2009
61 HOOPER, IVAN R 1514 LATHERS ST GARDEN CITY, MI 48135-3039	09-13412	3378	BLANK	(U)	8/20/2009	8/14/2009
62 JACKSON, ANDREA 1852 ROXBURY RD EAST CLEVELAND, OH 44112-4748	09-13412	3291	BLANK	(P)	8/17/2009	8/14/2009
63 JOHNSON, DENISE M 4620 MIDLAND AVE WATERFORD, MI 48329-1837	09-13412	3332	BLANK	(U)	8/17/2009	8/14/2009
64 KD PIPE & SUPPLY 114 STACKPOLE ST ST MARYS, PA 15857-1458	09-13421	3305	\$32.50	(U)	8/17/2009	8/14/2009

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
65	KIM SUPPLY CO. 1604 MAGDA DR MONTPELIER, OH 43543-9206	09-13419	3526	BLANK	(U)	10/22/2009	8/14/2009
66	KNOLLMAN, VALEREE L 8315 DIMMICK RD CINCINNATI, OH 45241-1413	09-13412	3351	BLANK	(U)	8/17/2009	8/14/2009
67	LANE, LINDA S 4443 KINGDOM RD CLINCHPORT, VA 24244-3861	09-13412	3296	BLANK	(P)	8/17/2009	8/14/2009
68	LAWSON PRODUCTS INC 1666 E TOUHY AVE DES PLAINES, IL 60018	09-13414	3579	\$18,180.49	(U)	8/20/2009	8/14/2009
69	LEAS, MARK L 10812 S 510 W-90 MONTPELIER, IN 47359-9579	09-13412	3295	\$400,000.00 \$190,500.00	(S) (U)	8/17/2009	8/14/2009
70	LEDEL, LINDA 32817 N RIVER RD HARRISON TOWNSHIP, MI 48045	09-13412	3301	UNASCERTAINABLE	(U)	8/17/2009	8/14/2009
71	LING, KATHIE A 1233 S CREEK DR WIXOM, MI 48393-1675	09-13412	3333	\$441.73  UNLIQUIDATED	(U)	8/17/2009	8/14/2009
72	LONGMAN, RODNEY K 457 ROYAL PALM WAY BOCA RATON, FL 33432-7945	09-13412	3427	\$71,775.00	(U)	8/24/2009	8/14/2009
73	LORENZO, JOSEPH 1324 ROSELY RD ST MARYS, PA 15857	09-13412	3582	UNKNOWN  UNLIQUIDATED	(P)	9/21/2009	8/14/2009
74	LUTZ, BRIAN H 124 HUGO STREET SAN FRANCISCO, CA 94122	09-13412	3533	\$508.50	(U)	11/2/2009	8/14/2009

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
75 LYDALL THERMAL/ACCOUSTICAL C/O LYDALL INC ATTN: LEGAL DEPARTMENT PO BOX 151 MANCHESTER, CT 06045-0151	09-13417	3372	\$3,562.70 \$39,287.20	(A) (U)	8/18/2009	8/14/2009
76 MAGID GLOVE & SAFETY MFG CO LLC 2060 N KOLMAR AVENUE CHICAGO, IL 60639-3483	09-13412	3482	\$723.79	(U)	9/14/2009	8/14/2009
77 MAIN, JOHN PO BOX 218 VERNON, MI 48476-0216	09-13412	3335	BLANK	(U)	8/17/2009	8/14/2009
78 MARBLEY, DERRICK 1765 MARWELL BLVD HUDSON, OH 44236-1323	09-13412	3353	BLANK	(U)	8/17/2009	8/14/2009
79 MATEERS STORAGE TRAILOR RENTALS INC. 115 S REGIONAL RD GREENSBORO, NC 27409-9306	09-13414	3370	\$1,217.98	(U)	8/18/2009	8/14/2009
80 MCCROSSEN, CHARLES E 1454 E PEARL AVE HAZEL PARK, MI 48030-1925	09-13412	3304	BLANK	(P)	8/17/2009	8/14/2009
81 MERCIER, MICHAEL J 6786 CATHEDRAL CT SE ALTO, MI 49302	09-13412	3557	\$140,000.00 \$140,000.00	(P) (U)	11/18/2009	8/14/2009
82 METHODS MACHINE TOOLS INC 50531 VARSITY COURT WIXOM, MI 48393	09-13419	3347	\$413.12	(U)	8/17/2009	8/14/2009

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**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
83 METHODS MACHINE TOOLS INC. PO BOX 382 65 UNION AVE SUDBURY, MA 01776-2245	09-13419	3348	\$93.00	(U)	8/17/2009	8/14/2009
84 METHODS MACHINE TOOLS INC. PO BOX 382 65 UNION AVE SUDBURY, MA 01776-2245	09-13419	3349	\$726.27	(U)	8/17/2009	8/14/2009
85 MILLS, HAROLD E 6602 DELCROSS CT BRIGHTON, MI 48114-7418	09-13412	3434	BLANK	(P)	8/27/2009	8/14/2009
86 MILNER, KENNETH 23520 SHAGWOOD DR BINGHAM FARMS, MI 48025-3449	09-13412	3293	\$1,074.72	(P)	8/17/2009	8/14/2009
87 MOUNSEY, TERESA 2807 WARWICK DR CORINTH, TX 76210-1632	09-13412	3431	BLANK	(U)	8/25/2009	8/14/2009
88 MPI INTERNATIONAL 2129 AUSTIN AVE ROCHESTER HILLS, MI 48309	09-13412	3383	\$42,255.53 \$288,787.41	(A) (U)	8/20/2009	8/14/2009
89 MURATA MACHINERY USA INC PO BOX 667609 CHARLOTTE, NC 28266-7609	09-13412	3483	\$3,393.67	(U)	9/14/2009	8/14/2009
90 MURPHY, PHILLIP 3315 COUNTY RD 95 GAYLESVILLE, AL 35973-2134	09-13415	3342	BLANK	(P)	8/17/2009	8/14/2009
91 NASH, MARJORIE DELL 1706 BELFORD DR AUSTIN, TX 78757	09-13412	3345	\$3,051.00 \$3,051.00	(P) (U)	8/17/2009	8/14/2009

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**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
92	NAVAN, ROBERT A 1718 STONERIDGE DR SALINE, MI 48176-9270	09-13412	3367	BLANK	(U)	8/18/2009	8/14/2009
93	NORTHWAY TRUCKING, INC. MITCHEL E BLOOD 1351 SARTWELL CREEK ROAD PORT ALLEGANY, PA 16743	09-13412	3504	\$1,063.26	(U)	9/28/2009	8/14/2009
94	OGG, BRENT E 93 PARK ST MARSHALLVILLE, OH 44645	09-13412	3284	BLANK	(P)	8/17/2009	8/14/2009
95	OHIO LOGISTICS TRANSPORTATION GROUP PO BOX 952 2001 INDUSTRIAL DRIVE FINDLAY, OH 45839-0952	09-13412	3474	\$899.50	(U)	9/8/2009	8/14/2009
96	OLIVER, DEBBIE A 1791 HOOVER PL PLACENTIA, CA 92670	09-13412	3371	BLANK	(U)	8/18/2009	8/14/2009
97	OMEGA ENGINEERING INC ONE OMEGA DR STAMFORD, CT 06907	09-13412	3470	\$2,423.09	(U)	9/8/2009	8/14/2009
98	OPTICAL WHOLESALE 2633 RANDLEMAN RD GREENSBORO, NC 27406-5107	09-13414	3379	\$289.00	(U)	8/20/2009	8/14/2009
99	PARIS UNIFORM RENTAL PO BOX 1043 67 HOOVER AVE DUBOIS, PA 15801-2403	09-13412	3477	\$1,193.31	(U)	9/8/2009	8/14/2009
100	PARIS UNIFORM RENTAL 67 HOOVER AVE. DUBOIS, PA 15801	09-13412	3478	\$948.22	(U)	9/8/2009	8/14/2009

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**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
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**Total Claims Expunged:** 100

**Total Dollars Expunged:** \$2,861,111.94

**Case Legend:**

09-13411	MD PRODUCTS CORPORATION	09-13421	METALDYNE SINTERED COMPONENTS ST. MARYS	09-13431	METALDYNE US HOLDING CO.
09-13412	OLDCO M CORPORATION F/K/A METALDYNE CORPORATION	09-13422	NC-M CHASSIS SYSTEMS LLC	09-13432	ER ACQUISITION CORPORATION
09-13413	METALDYNE ENGINE CO., LLC	09-13423	PUNCHCRAFT COMPANY	09-13433	GMTI HOLDING COMPANY
09-13414	METALDYNE CO., LLC	09-13424	WINDFALL SPECIALTY POWDERS, INC.	09-13434	HALYARD AVIATION SERVICES, INC.
09-13415	METALDYNE LESTER PRECISION DIE CASTING, INC.	09-13425	METALDYNE ASIA, INC.	09-13435	MASCO TECH SATURN HOLDINGS, INC.
09-13416	METALDYNE SINTERED COMPONENTS LLC	09-13426	METALDYNE DRIVELINE CO.	09-13436	MASG DISPOSITION, INC.
09-13417	METALDYNE TUBULAR PRODUCTS, INC.	09-13427	METALDYNE EUROPE, INC.	09-13437	MASX ENERGY SERVICE GROUP, INC.
09-13418	METALDYNE DUPAGE DIE CASTING CORPPORATION	09-13428	METALDYNE PRECISION FORMING – FORT WAYNE	09-13438	PRECISION HEADED PRODUCTS, INC.
09-13419	METALDYNE MACHINING AND ASSEMBLY COMPANY	09-13429	METALDYNE SERVICES, INC.	09-13439	STAHL INTERNATIONAL, INC.
09-13420	METALDYNE LIGHT METALS COMPANY, INC.	09-13430	METALDYNE SINTERED COMPONENTS OF INDIANA	09-13440	WC MCCURDY CO.
				09-13441	METALDYNE INTERMEDIATE HOLDCO, INC.

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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**(P) - Priority**

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## **EXHIBIT 2**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re : Chapter 11  
Oldco M Corporation :  
(f/k/a Metaldyne Corporation), *et al.*, : Case No. 09-13412 (MG)  
Debtors. : (Jointly Administered)  
-----X

**DECLARATION OF DAPHNE CORRY HOPPENRATH  
IN SUPPORT OF THE OMNIBUS OBJECTION  
OF DEBTORS AND DEBTORS IN POSSESSION SEEKING TO  
DISALLOW CERTAIN LATE-FILED CLAIMS (OMNIBUS OBJECTION NO. 2)**

STATE OF MICHIGAN )  
 ) SS:  
COUNTY OF WAYNE )

I, Daphne Corry Hoppenrath, make this Declaration under 28 U.S.C. § 1746 and state as follows:

1. I am older than 21 years of age and suffer no legal disability. I am competent to make this Declaration.
2. I submit this Declaration for all permissible purposes under the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure and the Federal Rules of Evidence in support of the Omnibus Objection of Debtors and Debtors in Possession Seeking to Disallow Certain Late-Filed Claims (Omnibus Objection No. 2) (the "Objection").<sup>1</sup> I have read the Objection, and I am generally familiar with the information contained therein.

<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Objection.

3. I am a consultant at Accretive Solutions-Detroit, Inc. ("Accretive"), the claim reconciliation managers employed in these cases. Among my responsibilities in this position, I am the individual at Accretive responsible for assisting the Debtors in their review and analysis of all filed and scheduled claims in these chapter 11 cases and coordinating the overall reconciliation process. The other individuals involved in this process act either (a) at my direction and/or under my supervision (with respect to Accretive personnel) or (b) with my advice, consultation and coordination (with respect to the Debtors' personnel). Accordingly, I am familiar with the Late-Filed Claims and the other matters addressed herein and in the Objection and with the activities that have taken place to date concerning the review and analysis of the claims asserted in these cases, including all of the claims, facts and circumstances described in the Objection.

4. Except as otherwise indicated, my statements in this Declaration are based on my personal experience and knowledge as described above, my discussions with responsible management of the Debtors and my review of relevant documents. If called to testify, I could and would testify as stated herein.

5. In connection with the Debtors' ongoing claims reconciliation process, I or my designee at my direction have reviewed the proof of claim forms filed by the Claimants in connection with the Late-Filed Claims on Exhibit 1 attached to the Objection. I or a designee at my direction have determined the Bar Date that would apply to such proofs of claim. As a result of this review, I have determined that each Late-Filed Claim was filed after its applicable Bar Date.

I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: December 18, 2009

/s/ Daphne Corry Hoppenrath  
Daphne Corry Hoppenrath  
Consultant, Accretive Solutions

### **EXHIBIT 3**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re	:	Chapter 11
	:	
Oldco M Corporation	:	Case No. 09-13412 (MG)
(f/k/a Metaldyne Corporation), <i>et al.</i> ,	:	
	:	(Jointly Administered)
Debtors.	:	
-----X	:	

**ORDER DISALLOWING CERTAIN  
LATE-FILED CLAIMS (OMNIBUS OBJECTION NO. 2)**

This matter coming before the Court on the Omnibus Objection of Debtors and Debtors in Possession Seeking to Disallow Certain Late-Filed Claims (Omnibus Objection No. 2) (the "Objection"),<sup>1</sup> filed by the debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors"); the Court having reviewed the Objection and the Declaration of Daphne Corry Hoppenrath attached thereto as Exhibit 2 (the "Declaration") and having heard the statements of counsel regarding the relief requested in the Objection at a hearing before the Court (the "Hearing"); the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and (c) notice of the Objection and the Hearing was sufficient under the circumstances and in full compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules and orders of the Court; and the Court having determined that the legal and factual bases set forth in the Objection, the Declaration and at the Hearing establish just cause for the relief granted herein;

---

<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Objection.

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED in its entirety.
2. Each of the claims identified as "Claims To Be Expunged" on Exhibit 1 attached hereto and incorporated herein by reference is disallowed and expunged, pursuant to section 502 of the Bankruptcy Code.
3. The Debtors and their claims and noticing agent, The BMC Group, Inc.; and the Clerk of this Court are authorized to take any and all actions that are necessary or appropriate to give effect to this Order.

Dated: \_\_\_\_\_, 2010  
New York, New York

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE



## **EXHIBIT 1**

**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
1	ADT SECURITY SERVICES 14200 E EXPOSITION AVE AURORA, CO 80012	09-13412	3594	\$2,772.61	(U)	10/5/2009	8/14/2009
2	ALPHA TOOL & MOLD INC. 83 ALPHA PARK HIGHLAND HTS, OH 44143-2202	09-13418	3325	\$8,720.00	(A)	8/17/2009	8/14/2009
3	ALPHA TOOL & MOLD INC. 83 ALPHA PARK HIGHLAND HTS, OH 44143-2202	09-13415	3373	\$7,000.00	(A)	8/18/2009	8/14/2009
4	APCO FREIGHT SYSTEMS 303-B SWING ROAD GREENSBORO, NC 27419	09-13412	3491	\$9,165.00	(U)	9/21/2009	8/14/2009
5	ARC TECHNOLOGIES INC. PO BOX 219 GREENSBURG, PA 15601-0219	09-13426	3290	\$13,098.65	(U)	8/17/2009	8/14/2009
6	ARROW PEST CONTROL PO BOX 515 1815 N MICHIGAN ST PLYMOUTH, IN 46563-0515	09-13419	3317	\$211.56	(U)	8/17/2009	8/14/2009
7	ASARE, SAMUEL K 675 SEWARD ST APT 302 DETROIT, MI 48202-2443	09-13412	3319	BLANK	(U)	8/17/2009	8/14/2009
8	AT&T DBA BELL SOUTH ADVERTISING & PUBLISHING 600 N POINT PKWY ALPHARETTA, GA 30005	09-13412	3384	\$70.00	(U)	8/20/2009	8/14/2009
9	ATHWAL, SATNAM 29255 UTLEY FARMINGTON HILLS, MI 48334-4177	09-13412	3438	BLANK	(U)	8/28/2009	8/14/2009

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

**\*\* (A) - Administrative**  
**(P) - Priority**

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**In re: Oldco M Corporation f/k/a Metaldyne Corporation**  
**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
10 ATS AUTOMATION TOOLING SYSTEMS 250 ROYAL OAK ROAD BOX 32100, PRESTON CENTER CAMBRIDGE, ON N3H 5M2 CANADA	09-13419	3496	\$892.50	(U)	9/24/2009	8/14/2009
11 ATWELL, DEBRA 2050 OAKWOOD DR TROY, MI 48085	09-13412	3498	\$235,000.00 \$58,000.00 \$58,000.00	(S) (P) (U)	9/25/2009	8/14/2009
12 BADERTSCHER, RICHARD W 840 ROAD 313 BLUFFTON, OH 45817-5817	09-13412	3287	BLANK	(U)	8/17/2009	8/14/2009
13 BAKER, NORMAN 8 PECAN ST BELLEVILLE, MI 48111-8500	09-13412	3320	BLANK	(P)	8/17/2009	8/14/2009
14 BDI-BEARING DISTRIBUTORS INC ATTN: ANDREA MOELLER PO BOX 936 WATERLOO, IA 50704	09-13412	3507	\$2,925.07 \$41,201.42	(A) (U)	10/2/2009	8/14/2009
15 BELL, THEODORE 1214 SAINT CLAIR ST DETROIT, MI 48214-3670	09-13412	3331	UNASCERTAINABLE \$849.00  UNLIQUIDATED	(P) (U)	8/17/2009	8/14/2009
16 BENEFIEL, ROBERT E PO BOX 398 MACKINAW CITY, MI 49701-0398	09-13412	3330	\$187,800.00	(P)	8/17/2009	8/14/2009
17 BENSON, RAYMOND D 378 E MOUNTAIN RD LONGVIEW, TX 75604-6813	09-13412	3322	BLANK	(U)	8/17/2009	8/14/2009

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**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
18	BIJUR LUBRICATING CORP BIJUR DELIMON INTERNATIONAL 2100 GATEWAY CENTRE STE 109 MORRISVILLE, NC 27560	09-13412	3556	\$2,564.90	(U)	11/17/2009	8/14/2009
19	BLEVINS, PATRICIA K 2359 BISHOPTOWN RD DUFFIELD, VA 24244	09-13412	3469	BLANK	(U)	9/8/2009	8/14/2009
20	BROUSSARD, GERALD 2114 WILDERNESS POINT DR KINGWOOD, TX 77339-2205	09-13412	3376	\$255.79  UNLIQUIDATED	(U)	8/20/2009	8/14/2009
21	BROWN, PATSY JUNE 33064 GROTH DR STERLING HEIGHTS, MI 48312-6704	09-13412	3522	BLANK	(U)	10/19/2009	8/14/2009
22	BUCHOLTZ, DENNIS L 758 HIGHLAND DR ST CLAIR, MI 48079-4234	09-13412	3354	BLANK	(P)	8/17/2009	8/14/2009
23	BURDICK, THOMAS E & SUSAN M TEN COM CRANBERRY RD 251 CRANBERRY RD GROVE CITY, PA 16127-4633	09-13412	3467	BLANK	(P)	9/3/2009	8/14/2009
24	BURRIS, BEN F 5699 SUNSET DR DUBUQUE, IA 52002-2466	09-13412	3303	\$225.60	(U)	8/17/2009	8/14/2009
25	BYRNE, RANDAL 10005 BROOKFIELD ST LIVONIA, MI 48150-5717	09-13412	3473	BLANK	(U)	9/8/2009	8/14/2009
26	CARBIDE PROBES INC 1328 RESEARCH PK DR DAYTON, OH 45432	09-13412	3580	\$1,665.00	(U)	9/21/2009	8/14/2009

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**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
27	CARBIDE PROBES INC 1328 RESEARCH PARK DR DAYTON, OH 45432	09-13412	3592	\$4,389.15	(U)	9/21/2009	8/14/2009
28	CARBIDE PROBES, INC. 1328 RESEARCH PARK DR DAYTON, OH 45432-2818	09-13416	3494	\$1,665.00	(U)	9/22/2009	8/14/2009
29	CARBIDE PROBES, INC. 1328 RESEARCH PARK DR DAYTON, OH 45432-2818	09-13421	3495	\$4,389.15	(U)	9/22/2009	8/14/2009
30	CARTER, MYRTLE B 11225 CLINCH RIVER HWY FT BLACKMORE, VA 24250-2550	09-13412	3297	BLANK	(U)	8/17/2009	8/14/2009
31	CENTURY SPRING CORP 222 E 16TH ST LOS ANGELES, CA 90015-3616	09-13417	3528	\$120.91	(U)	10/26/2009	8/14/2009
32	CHERRY, JENNIFER K 863 LION ST ROCHESTER HILLS, MI 48307-4224	09-13412	3472	BLANK	(U)	9/8/2009	8/14/2009
33	CICHANSKI, R 130 E WILMETTE AVE PALATINE, IL 60067-7247	09-13412	3437	\$27,431.78	(U)	8/28/2009	8/14/2009
34	CROSSLEY, MITCHELL 9145 MILFORD HOLLY, MI 48442	09-13412	3368	BLANK	(U)	8/18/2009	8/14/2009
35	CROSSLEY, MITCHELL N 9145 MILFORD RD HOLLY, MI 48442-8508	09-13412	3369	BLANK	(U)	8/18/2009	8/14/2009
36	CYRUS, JAMES R 5260 FREDONIA AVE DAYTON, OH 45431-2122	09-13412	3328	BLANK	(U)	8/17/2009	8/14/2009

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**OMNIBUS : EXHIBIT 1 - LATE FILED CLAIMS**  
**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
37	DALTON COMBUSTION SYSTEMS INC. PO BOX 25714 VALLEY VIEW, OH 44125-0714	09-13412	3436	\$696.00	(U)	8/28/2009	8/14/2009
38	DE ANGELIS, TERESA VIA RIMEMBRANZE 18 0510 SOTTO BG SOTTO 24046, ITALY	09-13412	3457	BLANK	(P)	9/1/2009	8/14/2009
39	DESIGN COMFORT CO. INC. 5977 BRIGHTON PINES CT HOWELL, MI 48843-6453	09-13417	3574	\$4,879.50	(U)	11/30/2009	8/14/2009
40	EDRICH PRODUCTS 33672 DOREKA FRASER, MI 48026	09-13412	3355	\$4,588.33	(U)	8/17/2009	8/14/2009
41	ELLERBROCK, ROBERT L 117 CARLINGS AVE OTTAWA, OH 45875-9404	09-13412	3311	BLANK	(U)	8/17/2009	8/14/2009
42	EQUIPMENT DEPOT OF ILLINOIS 2545 NORTHWEST PKWY ELGIN, IL 60124-7870	09-13412	3552	\$59,230.78	(U)	11/9/2009	8/14/2009
43	EVERETT, CHARLIE 336 KNOLLWOOD CIR SUMMERVILLE, GA 30747-5147	09-13412	3314	BLANK	(U)	8/17/2009	8/14/2009
44	FEDERAL-MOGUL CORPORATION CHAVANDA CENANCE 26555 NORTHWESTERN HWY SOUTHFIELD, MI 48033-2146	09-13412	3493	\$8,435.00 \$236,351.98 \$295,340.15	(S) (A) (U)	9/21/2009	8/14/2009
45	FIRE DEFENSE EQUIPMENT CO INC 4350 DELEMERE BLVD ROYAL OAK, MI 48073-1807	09-13412	3479	\$6,749.92	(U)	9/8/2009	8/14/2009

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**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
46	FORD MOTOR CREDIT COMPANY LLC PO BOX 537901 LIVONIA, MI 48153-9905	09-13412	3425	\$5,221.20	(S)	8/19/2009	8/14/2009
47	GENERAL KINEMATICS 5050 RICKERT RD CRYSTAL LAKE, IL 60014-7333	09-13412	3521	\$2,954.83	(U)	10/16/2009	8/14/2009
48	GIBSON, CURTIS 4689 CR 26 RAWSON, OH 45881-5881	09-13412	3527	BLANK	(U)	10/26/2009	8/14/2009
49	GROOT INDUSTRIES 2500 LANDMEIR ROAD ELK GROVE VILLAGE, IL 60007	09-13418	3497	BLANK	(U)	9/25/2009	8/14/2009
50	GUFFEY, TONY 511 S 12TH ST NEW CASTLE, IN 47362	09-13412	3480	BLANK	(U)	9/11/2009	8/14/2009
51	H D H MECHANICAL INC. 5040 CORBIN DR BEDFORD HEIGHTS, OH 44128-5414	09-13415	3433	\$9,250.21	(U)	8/27/2009	8/14/2009
52	HADYNAK, SCOTT A 12055 CRAIG ST ROMULUS, MI 48174-1106	09-13412	3510	BLANK	(P)	10/7/2009	8/14/2009
53	HAGEMEYER NORTH AMERICA PO BOX 404753 ATLANTA, GA 30384-4753	09-13412	3520	\$2,906.21	(U)	10/16/2009	8/14/2009
54	HAMILTON, JAMES 3300 HILL RD OSSEO, MI 49266	09-13412	3523	BLANK	(P)	10/19/2009	8/14/2009
55	HARRIS, PAUL 1388 SPEIGHT RD GREENVILLE, NC 27834	09-13412	3336	BLANK	(U)	8/17/2009	8/14/2009

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**CLAIMS TO BE EXPUNGED**

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
56	HASKIN & LARUE LLP JOHN HASKIN & JAY MEISENHOLDER 255 N ALABAMA ST INDIANAPOLIS, IN 46204-2131	09-13422	3340	\$100,000.00	(U) CONTINGENT UNLIQUIDATED DISPUTED	8/17/2009	8/14/2009
57	HASKIN & LARUE LLP JOHN H HASKIN ESQ ATTORNEY FOR PLAINTIFF GEE 255 N ALABAMA ST INDIANAPOLIS, IN 46204	09-13412	3341	\$100,000.00	(U) CONTINGENT UNLIQUIDATED DISPUTED	8/17/2009	8/14/2009
58	HEFTY, PHILIP R 2640 COUNTY RD 36A AUBURN, IN 46706-9401	09-13412	3329	\$202.75	(P)  UNLIQUIDATED	8/17/2009	8/14/2009
59	HENDRIAN, MICHAEL D 18551 VALLEYBROOK LN CLINTON TOWNSHIP, MI 48038	09-13412	3377	BLANK	(U)	8/20/2009	8/14/2009
60	HERRERA, FERMIN 3145 N OAKLEY AVE CHICAGO, IL 60618-6985	09-13412	3302	BLANK	(U)	8/17/2009	8/14/2009
61	HOOPER, IVAN R 1514 LATHERS ST GARDEN CITY, MI 48135-3039	09-13412	3378	BLANK	(U)	8/20/2009	8/14/2009
62	JACKSON, ANDREA 1852 ROXBURY RD EAST CLEVELAND, OH 44112-4748	09-13412	3291	BLANK	(P)	8/17/2009	8/14/2009
63	JOHNSON, DENISE M 4620 MIDLAND AVE WATERFORD, MI 48329-1837	09-13412	3332	BLANK	(U)	8/17/2009	8/14/2009
64	KD PIPE & SUPPLY 114 STACKPOLE ST ST MARYS, PA 15857-1458	09-13421	3305	\$32.50	(U)	8/17/2009	8/14/2009

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	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
65	KIM SUPPLY CO. 1604 MAGDA DR MONTPELIER, OH 43543-9206	09-13419	3526	BLANK	(U)	10/22/2009	8/14/2009
66	KNOLLMAN, VALEREE L 8315 DIMMICK RD CINCINNATI, OH 45241-1413	09-13412	3351	BLANK	(U)	8/17/2009	8/14/2009
67	LANE, LINDA S 4443 KINGDOM RD CLINCHPORT, VA 24244-3861	09-13412	3296	BLANK	(P)	8/17/2009	8/14/2009
68	LAWSON PRODUCTS INC 1666 E TOUHY AVE DES PLAINES, IL 60018	09-13414	3579	\$18,180.49	(U)	8/20/2009	8/14/2009
69	LEAS, MARK L 10812 S 510 W-90 MONTPELIER, IN 47359-9579	09-13412	3295	\$400,000.00 \$190,500.00	(S) (U)	8/17/2009	8/14/2009
70	LEDEL, LINDA 32817 N RIVER RD HARRISON TOWNSHIP, MI 48045	09-13412	3301	UNASCERTAINABLE	(U)	8/17/2009	8/14/2009
71	LING, KATHIE A 1233 S CREEK DR WIXOM, MI 48393-1675	09-13412	3333	\$441.73  UNLIQUIDATED	(U)	8/17/2009	8/14/2009
72	LONGMAN, RODNEY K 457 ROYAL PALM WAY BOCA RATON, FL 33432-7945	09-13412	3427	\$71,775.00	(U)	8/24/2009	8/14/2009
73	LORENZO, JOSEPH 1324 ROSELY RD ST MARYS, PA 15857	09-13412	3582	UNKNOWN  UNLIQUIDATED	(P)	9/21/2009	8/14/2009
74	LUTZ, BRIAN H 124 HUGO STREET SAN FRANCISCO, CA 94122	09-13412	3533	\$508.50	(U)	11/2/2009	8/14/2009

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Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
75 LYDALL THERMAL/ACCOUSTICAL C/O LYDALL INC ATTN: LEGAL DEPARTMENT PO BOX 151 MANCHESTER, CT 06045-0151	09-13417	3372	\$3,562.70 \$39,287.20	(A) (U)	8/18/2009	8/14/2009
76 MAGID GLOVE & SAFETY MFG CO LLC 2060 N KOLMAR AVENUE CHICAGO, IL 60639-3483	09-13412	3482	\$723.79	(U)	9/14/2009	8/14/2009
77 MAIN, JOHN PO BOX 218 VERNON, MI 48476-0216	09-13412	3335	BLANK	(U)	8/17/2009	8/14/2009
78 MARBLEY, DERRICK 1765 MARWELL BLVD HUDSON, OH 44236-1323	09-13412	3353	BLANK	(U)	8/17/2009	8/14/2009
79 MATEERS STORAGE TRAILOR RENTALS INC. 115 S REGIONAL RD GREENSBORO, NC 27409-9306	09-13414	3370	\$1,217.98	(U)	8/18/2009	8/14/2009
80 MCCROSSEN, CHARLES E 1454 E PEARL AVE HAZEL PARK, MI 48030-1925	09-13412	3304	BLANK	(P)	8/17/2009	8/14/2009
81 MERCIER, MICHAEL J 6786 CATHEDRAL CT SE ALTO, MI 49302	09-13412	3557	\$140,000.00 \$140,000.00	(P) (U)	11/18/2009	8/14/2009
82 METHODS MACHINE TOOLS INC 50531 VARSITY COURT WIXOM, MI 48393	09-13419	3347	\$413.12	(U)	8/17/2009	8/14/2009

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Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
83 METHODS MACHINE TOOLS INC. PO BOX 382 65 UNION AVE SUDBURY, MA 01776-2245	09-13419	3348	\$93.00	(U)	8/17/2009	8/14/2009
84 METHODS MACHINE TOOLS INC. PO BOX 382 65 UNION AVE SUDBURY, MA 01776-2245	09-13419	3349	\$726.27	(U)	8/17/2009	8/14/2009
85 MILLS, HAROLD E 6602 DELCROSS CT BRIGHTON, MI 48114-7418	09-13412	3434	BLANK	(P)	8/27/2009	8/14/2009
86 MILNER, KENNETH 23520 SHAGWOOD DR BINGHAM FARMS, MI 48025-3449	09-13412	3293	\$1,074.72	(P)	8/17/2009	8/14/2009
87 MOUNSEY, TERESA 2807 WARWICK DR CORINTH, TX 76210-1632	09-13412	3431	BLANK	(U)	8/25/2009	8/14/2009
88 MPI INTERNATIONAL 2129 AUSTIN AVE ROCHESTER HILLS, MI 48309	09-13412	3383	\$42,255.53 \$288,787.41	(A) (U)	8/20/2009	8/14/2009
89 MURATA MACHINERY USA INC PO BOX 667609 CHARLOTTE, NC 28266-7609	09-13412	3483	\$3,393.67	(U)	9/14/2009	8/14/2009
90 MURPHY, PHILLIP 3315 COUNTY RD 95 GAYLESVILLE, AL 35973-2134	09-13415	3342	BLANK	(P)	8/17/2009	8/14/2009
91 NASH, MARJORIE DELL 1706 BELFORD DR AUSTIN, TX 78757	09-13412	3345	\$3,051.00 \$3,051.00	(P) (U)	8/17/2009	8/14/2009

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92	NAVAN, ROBERT A 1718 STONERIDGE DR SALINE, MI 48176-9270	09-13412	3367	BLANK	(U)	8/18/2009	8/14/2009
93	NORTHWAY TRUCKING, INC. MITCHEL E BLOOD 1351 SARTWELL CREEK ROAD PORT ALLEGANY, PA 16743	09-13412	3504	\$1,063.26	(U)	9/28/2009	8/14/2009
94	OGG, BRENT E 93 PARK ST MARSHALLVILLE, OH 44645	09-13412	3284	BLANK	(P)	8/17/2009	8/14/2009
95	OHIO LOGISTICS TRANSPORTATION GROUP PO BOX 952 2001 INDUSTRIAL DRIVE FINDLAY, OH 45839-0952	09-13412	3474	\$899.50	(U)	9/8/2009	8/14/2009
96	OLIVER, DEBBIE A 1791 HOOVER PL PLACENTIA, CA 92670	09-13412	3371	BLANK	(U)	8/18/2009	8/14/2009
97	OMEGA ENGINEERING INC ONE OMEGA DR STAMFORD, CT 06907	09-13412	3470	\$2,423.09	(U)	9/8/2009	8/14/2009
98	OPTICAL WHOLESALE 2633 RANDLEMAN RD GREENSBORO, NC 27406-5107	09-13414	3379	\$289.00	(U)	8/20/2009	8/14/2009
99	PARIS UNIFORM RENTAL PO BOX 1043 67 HOOVER AVE DUBOIS, PA 15801-2403	09-13412	3477	\$1,193.31	(U)	9/8/2009	8/14/2009
100	PARIS UNIFORM RENTAL 67 HOOVER AVE. DUBOIS, PA 15801	09-13412	3478	\$948.22	(U)	9/8/2009	8/14/2009

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**CLAIMS TO BE EXPUNGED**

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Filed Date	Bar Date
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**Total Claims Expunged:** 100

**Total Dollars Expunged:** \$2,861,111.94

**Case Legend:**

09-13411	MD PRODUCTS CORPORATION	09-13421	METALDYNE SINTERED COMPONENTS ST. MARYS	09-13431	METALDYNE US HOLDING CO.
09-13412	OLDCO M CORPORATION F/K/A METALDYNE CORPORATION	09-13422	NC-M CHASSIS SYSTEMS LLC	09-13432	ER ACQUISITION CORPORATION
09-13413	METALDYNE ENGINE CO., LLC	09-13423	PUNCHCRAFT COMPANY	09-13433	GMTI HOLDING COMPANY
09-13414	METALDYNE CO., LLC	09-13424	WINDFALL SPECIALTY POWDERS, INC.	09-13434	HALYARD AVIATION SERVICES, INC.
09-13415	METALDYNE LESTER PRECISION DIE CASTING, INC.	09-13425	METALDYNE ASIA, INC.	09-13435	MASCO TECH SATURN HOLDINGS, INC.
09-13416	METALDYNE SINTERED COMPONENTS LLC	09-13426	METALDYNE DRIVELINE CO.	09-13436	MASG DISPOSITION, INC.
09-13417	METALDYNE TUBULAR PRODUCTS, INC.	09-13427	METALDYNE EUROPE, INC.	09-13437	MASX ENERGY SERVICE GROUP, INC.
09-13418	METALDYNE DUPAGE DIE CASTING CORPPORATION	09-13428	METALDYNE PRECISION FORMING – FORT WAYNE	09-13438	PRECISION HEADED PRODUCTS, INC.
09-13419	METALDYNE MACHINING AND ASSEMBLY COMPANY	09-13429	METALDYNE SERVICES, INC.	09-13439	STAHL INTERNATIONAL, INC.
09-13420	METALDYNE LIGHT METALS COMPANY, INC.	09-13430	METALDYNE SINTERED COMPONENTS OF INDIANA	09-13440	WC MCCURDY CO.
				09-13441	METALDYNE INTERMEDIATE HOLDCO, INC.

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

**\*\* (A) - Administrative**  
**(P) - Priority**

**(S) - Secured**  
**(U) - Unsecured**

The classification of the claims set forth herein is the classification asserted on the filed proof of claim. The Debtors include such classification for the purpose of identifying the claim to which the objection applies. The inclusion of the classification shall not constitute an acknowledgement by the Debtors that such classification is correct or appropriate.